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Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE FOR ALL DEFENDANTS
TO RESPOND TO PLAINTIFFS'
COMPLAINT AND SUBMIT
PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER**

**(THIRD REQUEST – Response to
Complaint)**

**(SECOND REQUEST – Submission of
Proposed Discovery Plan and Scheduling
Order)**

IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader (“Plaintiff”),
through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC and
Wynn Resorts, Ltd. (“Defendants”), through their counsel Jackson Lewis P.C., Defendant
Stephen Alan Wynn, through his counsel Peterson Baker, PLLC, and Defendant Maurice
Wooden, by and through his counsel Kennedy & Couvillier, that all Defendants shall have a 9-
day extension up to and including March 6, 2020, in which to file responses to Plaintiffs’

1 Complaint; and, that the Parties will have a 10-day extension to submit a proposed discovery
2 plan and scheduling order to the Court on March 16, 2020.

3 This Stipulation is submitted and based upon the following:

4 1. Defendants Wynn Las Vegas, LLC's and Wynn Resorts, Ltd.'s, Defendant
5 Stephen Alan Wynn's, and Defendant Maurice Wooden's responses to the Complaint all are
6 currently due on February 26, 2020. *See Order* [ECF No. 24].

7 2. Due to the class and collective claims alleged in the Complaint and pending
8 discussions between Plaintiffs' and Defendants' counsels in this case regarding the allegations,
9 multiple subclasses, and necessary investigation of the class and collective claims, additional time
10 is needed by all Defendants in order to respond to the Complaint.

11 3. In addition, pursuant to LR 26-1, the proposed discovery plan and scheduling order
12 is currently due no later than March 4, 2020.

13 4. However, the Parties are continuing to discuss the class claims in this case and
14 exploring whether some of the issues and claims may be narrowed or resolved early without the
15 need for motion practice prior to commencing discovery, which may further narrow the scope of
16 discovery in this class action case with multiple subclasses. Thus, the Parties request the Court
17 grant an extension on the deadline to submit the proposed discovery plan and scheduling order so
18 the Parties can conclude their discussions and submit their responses to the Complaint prior to
19 submitting a proposed discovery plan and scheduling order.

20 5. The parties request the Court grant a brief, 9-day extension of the deadline to file a
21 response to the Complaint to March 6, 2020, and grant a 10-day extension of the deadline to file a
22 proposed discovery plan and scheduling order pursuant to LR 26-1 to March 16, 2020.

23 6. This is the second request for an extension of time for the Parties to file a proposed
24 discovery plan and scheduling order pursuant to LR 26-1.

25 7. This is the third request for an extension of time for Defendants to file a response
26 to Plaintiff's Complaint.

27 8. This request is made in good faith and not for the purpose of delay.
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